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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

DAVID BLACK,

Plaintiff,

v.

HARTFORD LIFE & ACCIDENT
INSURANCE COMPANY,

Defendant.

Case No.: 3:17-cv-01785-HZ

**STIPULATED MOTION FOR
EXTENTION TO RESPOND TO
PLAINTIFF'S MOTION TO COMPEL
PRODUCTION**

Plaintiff David Black ("Plaintiff") and Hartford Life & Accident Insurance Company ("Hartford") through counsel and pursuant to Fed. R. Civ. P. 6(b), hereby moves for an extension of time to respond to the Motion to Compel Production filed by Plaintiff. In support of this Motion, Hartford states as follows:

1. Plaintiff filed his Motion to Compel Production ("Motion") on June 15, 2018 (Dkt. #15), in the United States District Court for the District of Oregon, Portland Division.
2. Hartford's response to the Motion is currently due Monday, June 25, 2018 pursuant to this Court's minute order dated June 5, 2018 (Dkt. #14).
3. Hartford requires a brief extension of time, up to and including Wednesday, June

27, 2018, to fully respond to the allegations in Plaintiff's Motion in light of undersigned
1 – STIPULATED MOTION FOR
EXTENTION TO RESPOND TO
PLAINTIFF'S MOTION TO COMPEL
PRODUCTION

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counsel's office location move.

4. This Motion is being made in good faith and for no improper purpose. Further, the requested enlargement of time will not prejudice any of the parties or unduly delay the proceedings.

5. Undersigned counsel has conferred with Plaintiff's counsel regarding this requested extension and she has stipulated on behalf of her client to an extension through Wednesday June 27, 2018.

MEMORANDUM OF LAW

Pursuant to Federal Rules of Civil Procedure, 6(b)(1)(A), "[w]hen an act may or must be done within a specified time, the court may, for good cause, extend that time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires...." The reason for the motion, as stated above, sets forth good cause for the enlargement of time requested, and is being made before the originally prescribed period expires.

Therefore, Hartford respectfully suggests that good cause has been shown for an enlargement of time – through Wednesday, June 27, 2018 – to respond to Plaintiff's Motion. As Plaintiff's counsel does not oppose the requested enlargement, there will be no undue delay or prejudice suffered by granting the relief requested herein.

WHEREFORE, Hartford respectfully requests that the Court grant this Motion and extend the deadline to file a response to Plaintiff's Motion to Compel Production until Wednesday, June 27, 2018.

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Dated: June 22, 2018.

MEGAN E. GLOR, ATTORNEYS AT LAW, OGLETREE, DEAKINS, NASH, SMOAK &
P.C. STEWART, P.C.

By: /s/ Megan E. Glor

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Accident Insurance Company

ORDER

IN CONFORMITY with the foregoing Stipulation, the deadline for Defendant's Response to Plaintiff's Motion to Compel Production is extended to Wednesday, June 27, 2018.

DATED this ____ day of _____, 2018.

HONORABLE MARCO A. HERNANDEZ
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on June 25, 2018 I served the foregoing STIPULATED MOTION FOR EXTENSION TO RESPOND TO PLAINTIFF'S MOTION TO COMPEL PRODUCTION on:

Megan E. Glor
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John C. Shaw
Email: john@meganglor.com
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Attorney for Plaintiff David Black

- ☒ by **electronic** means through the Court's eFile and Serve system.
- ☐ by **mailing** a true and correct copy to the last known address of each person listed above. It was contained in a sealed envelope, with postage paid, addressed as stated above, and deposited with the U.S. Postal Service in Seattle, Washington.
- ☐ by causing a true and correct copy to be **hand-delivered** to the last known address of each person listed above. It was contained in a sealed envelope and addressed as stated above.
- ☐ by causing a true and correct copy to be delivered **via overnight courier** to the last known address of each person listed above. It was contained in a sealed envelope, with courier fees paid, and addressed as stated above.
- ☐ by **e-mailing** a true and correct copy to the last known email address of each person listed above.

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